

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
) No. 4:22MC640 PLC
v.)
)
APPROXIMATELY 223 ASSORTED)
FIREARMS AND AMMUNITION,)
)
Defendant.)

MOTION TO EXTEND TIME TO FILE COMPLAINT FOR FORFEITURE

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jonathan A. Clow, Assistant United States Attorney for said District, and respectfully moves this Court to extend the time in which the United States is required to file a verified complaint for forfeiture and in support of its Motion states as follows:

1. On February 16, 2022, the defendant property, as further described in Attachment A, was seized from Shawn Stockard during the course of a criminal investigation.
2. All of the written notice of intent to forfeit required by Title 18, United States Code, Section 983(a)(1)(A) to be sent by the Bureau of Alcohol, Tobacco, Firearms and Explosives to interested parties has been sent.
3. The time has expired for any person to file an administrative claim to the property under Title 18, United States Code, Section 983(a)(2)(A)-(E).
4. The only person to file an administrative claim to the defendant property with the Bureau of Alcohol, Tobacco, Firearms and Explosives is Stephanie Stockard on April 27, 2022.
5. Title 18, United States Code, Section 983(a)(3)(A) provides as follows:

Not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a court in the district in which the complaint will be filed **may extend the period for filing a complaint for good cause shown** or upon agreement of the parties.

6. Title 18, United States Code, Section 983(a)(3)(B) also provides that the United States may maintain possession of the property by filing criminal charges within the relevant time frame.

7. Accordingly, absent an order extending its time, the United States must either file a civil complaint for forfeiture of the above-captioned property or file criminal charges on or about July 26, 2022.

8. The United States has an ongoing criminal investigation regarding the conduct giving rise to the forfeiture of the property. If a civil complaint is filed, any discovery in a civil case would impede the Government's ability to conduct its ongoing criminal investigation and would also create a burden on the claimant's right against self-incrimination. Should the property be returned to the claimant there would be no assurance that the property would be available as evidence in any subsequent court proceedings.

9. The requested extension is in the interest of justice insofar as it avoids the need for duplicative actions and thereby conserves judicial and other governmental resources.

10. A proposed order is included herewith for the Court's consideration.

WHEREFORE, for the foregoing good cause, the Government respectfully requests that the Court extend the period in which the United States is required to file a Complaint against the

property and/or to return criminal charges until October 24, 2022.

Dated: July 15, 2022

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Jonathan A. Clow
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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2022, a copy of the foregoing was sent via first-class mail, postage prepaid and addressed to the following:

Stephanie Stockard
180 Super Bowl
Jackson, MO 63755

/s/ Jonathan A. Clow
JONATHAN A. CLOW, #68003(MO)
Assistant United States Attorney

Attachment A

1. 125 Rounds Remington Ammunition CAL:12
2. Sig-Sauer 1911 Pistol CAL:10 SN:54E001928
3. Sig-Sauer P238 Pistol CAL:380 SN:27B062518
4. Glock GMBH 34GEN5 Pistol CAL:9 SN:BLAL815
5. Glock GMBH 45 Pistol CAL:9 SN:BSFB623
6. Kimber Custom II Pistol CAL:10 SN:KF66258
7. Colt Auto Pistol CAL:25 SN:386390
8. Smith & Wesson 60 Revolver CAL:38 SN:R120433
9. Colt Anaconda Revolver CAL:44 SN:MM68345
10. North American Arms NAA22 Revolver CAL:22 SN:BTT00700
11. Smith & Wesson 27 Revolver CAL:357 SN:N177038
12. Colt King Cobra Revolver CAL:357 SN:KV7390
13. Smith & Wesson 17 Revolver CAL:22 SN:K417286
14. Smith & Wesson 12 Airweight Revolver CAL:38 SN:C237817
15. Smith & Wesson 27 Revolver CAL:357 SN:N46547
16. Smith & Wesson 27 Revolver CAL:357 SN:N477271
17. Smith & Wesson 631 Ladysmith Revolver CAL:32 SN:BEZ4386
18. Sig-Sauer P238 Pistol CAL:380 SN:27A027481
19. Fie S38 Revolver CAL:38 SN:N017459
20. Smith & Wesson 686 Revolver CAL:357 SN:AVN5960
21. Beretta USA Corp 96 Pistol CAL:40 SN:BER208380
22. Sig-Sauer 1911 Pistol CAL:45 SN:54B156809
23. Heritage Mfg. Inc. Rough Rider Revolver CAL:22 SN:P39093
24. Smith & Wesson 27 Revolver CAL:357 SN:REG0028
25. Smith & Wesson 629 Revolver CAL:44 SN:AJC7448
26. Colt Cobra Revolver CAL:38 SN:RA534019
27. Colt Mustang Plus II Pistol CAL:380 SN:RS42082
28. Taurus The Judge Revolver CAL:45/410 SN:BR618355
29. M.A.B. D Pistol CAL:32 SN:114990
30. Smith & Wesson 66 Revolver CAL:357 SN:2K82288
31. Smith & Wesson 686 Revolver CAL:357 SN:AFJ7927
32. Auto Ordnance West Hurley, NY 1911 Pistol CAL:38 SN:A0C31761
33. Makarov IJ-70 Pistol CAL:Unknown SN:BB4935
34. Makarov Unknown Pistol CAL:9 SN:KO18936
35. Smith & Wesson 27 Revolver CAL:357 SN:83820
36. Zastava 70 Pistol CAL:32 SN:123908
37. CZ (Ceska Zbrojovka) CZ75 BD Pistol CAL:9 SN:B505198
38. Magnum Research, Inc. Desert Eagle Pistol CAL:50 SN:108723
39. Smith & Wesson 351C Revolver CAL:22 SN:CXT6252
40. Heritage Mfg. Inc. Barkeep Revolver CAL:22 SN:1BH534276
41. Smith & Wesson 27 Revolver CAL:357 SN:102557
42. HS Produkt (IM Metal) Hellcat Pistol CAL:9 SN:BA493485

43. Smith & Wesson 629 Revolver CAL:44 SN:AES2776
44. Smith & Wesson 648 Revolver CAL:22 SN:BEZ9937
45. Colt Python Revolver CAL:357 SN:PY201689
46. Smith & Wesson 629 Revolver CAL:44 SN:BFB0610
47. Beretta, Pietro S.P.A. 950 Pistol CAL:22 SN:70685CC
48. Sig-Sauer Mosquito Pistol CAL:22 SN:F232666
49. Kahr Arms - Auto Ordnance 1927A1 Rifle CAL:45 SN:KJ0771
50. PTR Industries Inc. (PTR-91 Inc.) PTR 32KC Rifle CAL:762 SN:
51. North American Arms The Wasp Revolver CAL:22 SN:VT07846
52. Winchester 120 Shotgun CAL:12 SN:L1463559
53. Keltec, CNC Industries, Inc. RFB Rifle CAL:762 SN:T4L79
54. German Sports Guns GSG-MP40 Pistol CAL:9 SN:A871533
55. Olympic Arms Inc (SGW Enterprises & Safari Arms) MFR Rifle C
56. Aero Precision X15 Rifle CAL:Multi SN:X085359
57. Palmetto State Armory PA-15 Rifle CAL:Multi SN:SCD206054
58. Heckler & Koch Inc. HK911 Rifle CAL:762 SN:41061020
59. North American Arms NAA22 Revolver CAL:22 SN:S5161
60. Derya Arms (Derya Silya Sanayi) VRBP100 Shotgun CAL:12 SN:R1
61. 76 Rounds Assorted Ammunition CAL:Multi
62. 475 Rounds Assorted Ammunition CAL:Multi
63. 950 Rounds Assorted Ammunition CAL:Multi
64. Imbel FZ SA Rifle CAL:762 SN:PAC1191
65. Arsenal Inc. SAM7 Rifle CAL:762 SN:AC544408
66. 1270 Rounds Remington Ammunition CAL:12
67. Seekins Precision SP223 Rifle CAL:Multi SN:SP8852
68. Hesse LTD H91 Rifle CAL:308 SN:G003022
69. Sharps Bros Mfg. Hellbreaker Pistol CAL:Multi SN:01-00976
70. Remington 870 Express Magnum Shotgun CAL:20 SN:A150544U
71. Mega Machine Shop Inc. Gator Rifle CAL:Multi SN:MGA0541
72. Israel Weapon Ind- IWI (Israel Military Ind- IMI) Uzi Rifle
73. Izhmash (IMEZ) Saiga Shotgun CAL:20 SN:H07590809
74. Sig Sauer (Sig-Arms) P226 Pistol CAL:40/357 SN:OO762314
75. Colt Officers ACP Pistol CAL:45 SN:SF11035
76. 2892 Rounds Assorted Ammunition CAL:Multi
77. Calico MI00 Rifle CAL:22 SN:008353
78. Colt Government Pistol CAL:45 SN:SS40928
79. Romarm/Cugir FPK Dragunov Rifle CAL:762 SN:C-8979-75
80. Anderson Manufacturing AM-15 Rifle CAL:Multi SN:14140316
81. Sun City Machinery Co., Ltd. Stevens 320 Shotgun CAL:12 SN:1
82. Remington Arms Company, Inc. 1100 Shotgun CAL:20 SN:150195X
83. Colt Gold Cup Natl Match Pistol CAL:45 SN:19076E
84. Zastava M90 Rifle CAL:762 SN:005237
85. Sig-Sauer P229 Pistol CAL:40/357 SN:AL56121

86. Colt Officers ACP Pistol CAL:45 SN:SF27796
87. Sun City Machinery Co., Ltd Stevens 320 Shotgun CAL:20 SN:15
88. Colt Lightweight Comm Pistol CAL:45 SN:FL08752E
89. Mossberg 935 Shotgun CAL:12 SN:AM076748
90. Colt Officers Model Match Revolver CAL:22 SN:83134
91. Remington Arms Company, Inc. 1100 Shotgun CAL:12 SN:R080708V
92. Astra 1921 Pistol CAL:9 SN:80800
93. Colt 1911 Pistol CAL:45 SN:508127
94. Century Arms International GP 1975 Sporter Rifle CAL:762 SN:
95. Taurus International PT1911 Pistol CAL:45 SN:NCM72215
96. Spike's Tactical LLC Crusader Pistol CAL:Unknown SN:DV019312
97. Colt 1911 Pistol CAL:45 SN:2350044
98. Colt 1911 Pistol CAL:45 SN:DGN070
99. Colt Marine CQBP Pistol CAL:45 SN:2830798
100. Sota Arms Inc. SA15 Pistol CAL:Multi SN:007647
101. Spike's Tactical LLC ST15 Pistol CAL:Multi SN:NSL144135
102. Heckler and Koch P7M8 Pistol CAL:9 SN:97065
103. Colt 1911 Pistol CAL:45 SN:SDG047
104. Century Arms International C39 Pistol CAL:762 SN:39WM
105. Colt 1903 Pistol CAL:32 SN:3966
106. 30745 Rounds Assorted Ammunition CAL:Multi
107. Norinco (North China Industries) SKS Rifle CAL:762 SN:122451
108. Chongqing Jianshe Machinery Co., Ltd. (EMEI) JTS-12 Shotgun
109. Sig-Sauer P229C Pistol CAL:9 SN:55B041856
110. Smith & Wesson 629 Revolver CAL:44 SN:BED5787
111. Colt 1908 Pistol CAL:380 SN:29589
112. Ruger Ruger-57 Pistol CAL:57 SN:641-26883
113. Palmetto State Armory PA-15 Rifle CAL:Multi SN:SCD206082
114. Rock Island Armory Inc. (Geneseo, IL) 1911A1 Pistol CAL:45 S
115. Izhmash (IMEZ) Tiger Rifle CAL:762 SN:199438871
116. 3950 Rounds Assorted Ammunition CAL:Multi
117. Glock Inc. 17 Pistol CAL:9 SN:BPFN345
118. Anderson Manufacturing AM-15 Pistol CAL:Multi SN:14161288
119. Sig Sauer (Sig-Arms) P229 Pistol CAL:9 SN:55E004509
120. Chinese SKS Rifle CAL:762 SN:P2085
121. Colt 1908 Pistol CAL:380 SN:20956
122. Franchi 500 Shotgun CAL:12 SN:R04677
123. Marlin Firearms Co. 70PSS Rifle CAL:22 SN:97429599
124. Sig-Sauer P220 Elite Pistol CAL:45 SN:G515778
125. Chongqing Jianshe Machinery Co., Ltd. (EMEI) JTS-12 Shotgun
126. Bushmaster Firearms Carbon 15 Rifle CAL:223 SN:CBC079777
127. 216 Rounds Assorted Ammunition CAL:Multi
128. Masterpiece Arms MPA971 Rifle CAL:9 SN:C0356

129. Browning AS Shotgun CAL:12 SN:116ZW19350
130. Wesson Arms, DAN Commander Classic Pistol CAL:45 SN:1502643
131. Microtech Small Arms Research STG-556 Rifle CAL:223 SN:600-P
132. Romarm/Cugir Wasr-10 Rifle CAL:762 SN:1972D13354
133. Glock Inc. 21 Pistol CAL:10 SN:WTG317
134. Bond Arms Inc. Century 2000 Derringer CAL:45/410 SN:57422
135. Beretta USA Corp 21A Pistol CAL:22 SN:BCS 03861 U
136. Glock GMBH 48 Pistol CAL:9 SN:BLWD390
137. Glock Inc. 21GEN4 Pistol CAL:45 SN:BAAE825
138. Glock GMBH 45 Pistol CAL:9 SN:BKDV613
139. Glock GMBH 27GEN4 Pistol CAL:40 SN:KSP781296
140. Glock GMBH 19 Pistol CAL:9 SN:BREM330
141. Smith & Wesson 66 Revolver CAL:357 SN:AW5663
142. Colt Combat Commander Pistol CAL:45 SN:FC02398E
143. Colt Government Pistol CAL:45 SN:SS21985E
144. Sig Sauer (Sig-Arms) P938 Pistol CAL:9 SN:52A021650
145. Smith & Wesson 66 Revolver CAL:357 SN:6K62411
146. Smith & Wesson 617 Revolver CAL:22 SN:BEF5375
147. Smith & Wesson 625 Revolver CAL:45 SN:CER6432
148. 816 Rounds Assorted Ammunition CAL:Multi
149. Springfield Armory, Geneseo, IL 1911A1 Pistol CAL:45 SN:N449
150. Glock GMBH 43X Pistol CAL:9 SN:BRSW556
151. Smith & Wesson 629 Revolver CAL:44 SN:BUA1855
152. Smith & Wesson 669 Pistol CAL:9 SN:TAU6956
153. Smith & Wesson 650 Revolver CAL:22 SN:ADN8540
154. Smith & Wesson 40 Revolver CAL:38 SN:DBJ7413
155. Smith & Wesson Unknown Revolver CAL:44 SN:23821
156. Smith & Wesson 629 Revolver CAL:44 SN:BPW2569
157. Smith & Wesson 627 Revolver CAL:357 SN:BEK5054
158. Smith & Wesson 60 Revolver CAL:38 SN:BDA 8587
159. Smith & Wesson 686 Revolver CAL:357 SN:BRW1858
160. Smith & Wesson 629 Revolver CAL:44 SN:N871788
161. Smith & Wesson 640 Revolver CAL:357 SN:DKS9979
162. Smith & Wesson 624 Revolver CAL:44 SN:ALU0102
163. Smith & Wesson 66 Revolver CAL:357 SN:6X964
164. Smith & Wesson 686 Revolver CAL:357 SN:ACL3247
165. Smith & Wesson 649 Revolver CAL:38 SN:AYT2524
166. Colt King Cobra Revolver CAL:357 SN:KK0994
167. Smith & Wesson 31 Revolver CAL:32 SN:817874
168. Smith & Wesson 651 Revolver CAL:22 SN:ADH3205
169. Sig-Sauer P239 Pistol CAL:9 SN:SA-28144
170. Sig-Sauer P229 Pistol CAL:357 SN:AM175453
171. Smith & Wesson 657 Revolver CAL:41 SN:ANE4452

- 172. Taurus 731 Revolver CAL:32 SN:UI37901
- 173. Smith & Wesson 60 Revolver CAL:38 SN:ALU6934
- 174. Smith & Wesson 629 Revolver CAL:44 SN:BTA0822
- 175. Smith & Wesson 651 Revolver CAL:22 SN:LH50005
- 176. Smith & Wesson 40 Revolver CAL:38 SN:29179
- 177. Sig-Sauer P229 Pistol CAL:9 SN:AE22610
- 178. Colt Government Pistol CAL:38 SN:ELCEN11850
- 179. Smith & Wesson 66 Revolver CAL:357 SN:64K8756
- 180. Colt Officers Revolver CAL:38 SN:367252
- 181. Smith & Wesson 648 Revolver CAL:22 SN:BFA1832
- 182. Smith & Wesson 27 Revolver CAL:357 SN:S163813
- 183. Smith & Wesson 629 Revolver CAL:44 SN:BBA1862
- 184. Glock GMBH 30 Pistol CAL:45 SN:MPS214
- 185. Smith & Wesson 10 Revolver CAL:38 SN:S865245
- 186. Smith & Wesson 610 Revolver CAL:10 SN:BFA5636
- 187. Smith & Wesson 1917 Revolver CAL:45 SN:136830
- 188. Smith & Wesson 657 Revolver CAL:41 SN:CCW7044
- 189. Colt Commander Pistol CAL:45 SN:CJ45841
- 190. Kimber Raptor II Pistol CAL:45 SN:K187307
- 191. Colt New Police Revolver CAL:32 SN:91
- 192. Sig-Sauer P226 Pistol CAL:9 SN:UU711370
- 193. Smith & Wesson K-200 Revolver CAL:Unknown SN:V388853
- 194. Smith & Wesson 38 Revolver CAL:38 SN:CBC9911
- 195. Colt MK IV Mustang Pistol CAL:380 SN:SS13796
- 196. Smith & Wesson 66 Revolver CAL:357 SN:BEE0806
- 197. Colt Concealed Carry Officer Pistol CAL:45 SN:LF10451E
- 198. Smith & Wesson 66 Revolver CAL:357 SN:15K8306
- 199. Colt Officers ACP Pistol CAL:45 SN:SF01358E
- 200. Glock Inc. 29GEN4 Pistol CAL:10 SN:BFUK698
- 201. Smith & Wesson 617 Revolver CAL:22 SN:CAD7043
- 202. Colt Government Pistol CAL:45 SN:SS17192
- 203. Glock GMBH 35 Pistol CAL:40 SN:FGN752
- 204. Walther PP Pistol CAL:32 SN:984386
- 205. Smith & Wesson 649 Revolver CAL:357 SN:CCY1816
- 206. Smith & Wesson 17 Revolver CAL:22 SN:K214909
- 207. Smith & Wesson 629 Revolver CAL:44 SN:N866688
- 208. Smith & Wesson 40 REvolver CAL:38 SN:14552
- 209. Smith & Wesson 686 Revolver CAL:Unknown SN:AWW7973
- 210. Smith & Wesson 1000 Shotgun CAL:12 SN:FS89831
- 211. Waffen Werks Knoxville, TN AK-74 Rifle CAL:545 SN:WW03639
- 212. Franchi Hunter Shotgun CAL:12 SN:B12810
- 213. Browning BPS Shotgun CAL:20 SN:36687NT162
- 214. Romarm/Cugir Wasr-10 Rifle CAL:762 SN:1971CS0936

- 215. Colt Officers Model Revolver CAL:32 SN:G42762
- 216. Brescia Armas Unknown Shotgun CAL:12 SN:FF12827
- 217. Astra 1921 Pistol CAL:9 SN:79068
- 218. Franchi Hunter Shotgun CAL:20 SN:L07665
- 219. Smith & Wesson 19 Revolver CAL:38 SN:66680
- 220. Franchi Unknown Shotgun CAL:Unknown SN:C011337
- 221. Browning Unknown Shotugn CAL:12 SN:05537ZW121
- 222. Smith & Wesson 1905 Revolver CAL:45 SN:12727
- 223. Sharps Bros Mfg. The Jack Rifle CAL:Multi SN:JACK11328